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April 2, 2002

Mr. Roger Johnson
California Energy Commission
1516 9th Street
Sacramento, California 95814

Subject: Roseville Energy Facility (Docket Number 01-AFC-14)
Transmittal of 2002 Biological Survey Workplan Addendum

Dear Mr. Johnson:

This letter describes the proposed survey methods for additional linear components proposed as part of the Roseville Energy Facility (REF) (Docket Number 01-AFC-14). Additional linear project components include reconductoring, and/or rebuild of existing transmission lines, construction of new transmission line, and construction of new natural gas pipelines. The 2001 Survey Workplan submitted to the California Energy Commission (CEC) on March 1, 2001, included survey methods for new transmission line construction, transmission line replacement, and new pipeline construction. The March 2001 Survey Workplan was verbally approved by the CEC staff on March 23, 2001, by the U.S. Fish and Wildlife Service (USFWS) staff on May 3, 2001 and by the California Department of Fish and Game (CDFG) on June 7, 2001. The previously approved survey methods, including reconnaissance, botanical, and wildlife surveys and wetland delineation, will be strictly adhered to as part of the 2002 field survey effort unless otherwise noted. Survey methods for the new linear components are planned as follows:

TRANSMISSION LINE RECONDUCTORING

Existing transmission lines proposed for reconductoring will be surveyed using the "reconnaissance survey" methodology described in the March 1, 2001 workplan. Habitats will be mapped and characterized within 125 feet from the edge of the transmission line corridor easement. During the habitat mapping effort, sensitive biological resources such as vernal pools, elderberry shrubs, raptor nest sites, wetlands, and other habitats suitable for hosting special-status species will be identified. All sensitive biological resources will be documented, mapped, and identified as exclusion areas and avoided during construction. Transmission line reconductoring will require temporary overland access to the transmission line towers but will not require clearing or grading. Specific measures to avoid sensitive resources as previously noted will be incorporated by project design during the identification of temporary access roads.

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Please note that the 2002 transmission line reconductoring survey effort does not include focused surveys for special-status species or wetland delineation because the transmission line reconductoring construction methods to be committed to will avoid sensitive biological resources.

TRANSMISSION LINE REBUILD

Some of the reconductored transmission line segments may require the rebuilding or adding towers to accommodate the reconductored line. Transmission line rebuilds and new tower construction will be surveyed using the "reconnaissance survey" methodology described in the March 1, 2001 workplan. All route segments proposed for rebuild will be surveyed via detailed habitat mapping out to 250 feet from the edge of the transmission line easement corridor. During the habitat mapping effort, sensitive biological resources such as vernal pools, elderberry shrubs, raptor nest sites, wetlands, and other habitats suitable for hosting special-status species will be identified. All sensitive biological resources will be documented, mapped, and identified as exclusion areas that will be avoided during construction.

Transmission line tower construction and the rebuild effort will require temporary access roads from existing roadways to the tower pad locations. These access roads will not be cleared or graded. Specific measures to avoid sensitive resources as previously noted will be incorporated by project design during the identification of temporary access roads.

Note that the 2002 transmission line rebuilding survey effort does not include focused surveys for special-status species or wetland delineation because the transmission line rebuild construction activities will be sited and/or designed to avoid sensitive biological resources.

NEW TRANSMISSION LINE

Biological field surveys of new transmission line alignments will be conducted as described in the March 1, 2001 workplan with one exception, as noted below. Habitats will be mapped within a 1,000-foot-wide survey corridor (500 feet either side of centerline) during the "reconnaissance survey". Focused surveys for special-status plant and wildlife species will be conducted, as appropriate, following the reconnaissance surveys. Portions of the survey corridor that are developed or that are in active cultivation will be surveyed to the level necessary to determine whether there is habitat suitable for special-status species. Potential wetlands will be mapped within the survey corridor, and formally delineated within 50 feet of the proposed construction right-of-way.

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NEW NATURAL GAS PIPELINE

Biological field surveys of the proposed new natural gas pipeline alignments will be conducted as described in the March 1, 2001 workplan. Habitats will be mapped within a 1,000-foot-wide survey corridor during the "reconnaissance survey". Focused surveys for special-status plant and wildlife species will be conducted as appropriate following the reconnaissance surveys. Portions of the survey corridor that are developed or that are in active cultivation will be surveyed to the level necessary to determine whether there is habitat suitable for special-status species. Potential wetlands will be mapped within the survey corridor, and formally delineated within 50 feet of the proposed construction right-of-way.

No additional surveys are proposed for segments of the new natural gas pipeline that have been previously surveyed by FPL Energy Sacramento Power, LLC (FPL), as part of the Rio Linda/Elverta Power Plant project. REF biologists will ground-truth the biological resource survey data submitted by FPL in the AFC filed with the CEC on February 2, 2001 and the supplemental survey data submitted to the CEC on June 18, 2001.

SURVEY TEAM

The 2002 survey effort will be conducted by qualified professional biologists with extensive experience in the study area. The team will consist of ornithologists, botanists, and zoologists, most of who participated on the 2001 survey team. Key REF survey staff are listed as follows:

Mr. Steve Kellogg is the biological resource peer reviewer for the REF. His duties include review of the survey protocol, peer review of the survey reports and environmental documents, and oversight during the agency consultation process. Mr. Kellogg has an MS in ecology and 30 years of experience, primarily in the western United States.

Ms. Anne Knowlton is the biological resources task manager for the REF. Her duties include teaming with Steve Leach to complete the following assignments: survey protocol preparation; field survey effort management; biological resources survey report and related environmental document preparation; agency coordination; and biology-related permit acquisition. Ms. Knowlton has a B.A. in geography and environmental studies and has 14 years of experience conducting biological resource assessments in California. She has extensive experience with biological surveys, including special-status species and wetland delineation, as part of the CEC power plant licensing/compliance process and worked as the biology task manager for the Pastoria Energy Facility, Ocotillo Energy Project, Mountainview Power Project, and High Desert Power Project.



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Mr. Steve Leach is the biological resources survey team leader for the REF. His duties include teaming with Anne Knowlton to complete the following assignments: survey protocol preparation; field survey effort management; biological resources survey report and related environmental document preparation; agency coordination; and biology-related permit acquisition. Mr. Leach has an MA in vegetation ecology and has 14 years of experience conducting biological resource assessments in California. He has extensive experience with biology-related surveys as part of the CEC power plant licensing/compliance process and was previously approved by the agencies to conduct surveys for the REF.

SCHEDULE

The Spring 2002 surveys were initiated on March 18, 2002. Surveys will continue through June 2002, consistent with the approved March 1, 2001 workplan(as amended).

We request your verbal and written concurrence with the above survey workplan addendum at your earliest convenience. In order to accommodate the flowering plant survey window, we are proceeding with surveys prior to receiving your approval. If you have any questions regarding the proposed workplan addendum, please contact Anne Knowlton at 805-964-6010 or Steve Leach at 510-874-3205.

Sincerely,

URS CORPORATION

Anne Knowlton
REF Task Leader

Robert Ray
REF AFC Project Manager

Cc: Sam Wehn, Enron North America
Mark Fillinger, Enron North America
Stuart Itoga, California Energy Commission